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Attorney for Plaintiff BMF Wallets, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BMF WALLETS, LLC,)	Case 2:21-cv-02181-RFB-DJA
)	
Plaintiff,)	
)	STIPULATED MOTION AND
v.)	[PROPOSED] ORDER FOR
)	EXTENSION OF TIME TO ANSWER
MIRAMAX, LLC,)	OR OTHERWISE RESPOND TO THE
)	COMPLAINT
Defendant.)	
)	(Second Request)

Pursuant to Federal Rule of Civil Procedure 6(b)(1), LR 7-1(c), and LR IA 6-1, Plaintiff BMF Wallets, LLC and Defendant Miramax, LLC, hereby move this Court for a 14-day extension of time for Defendant to file and serve its answer or otherwise respond to the Complaint (ECF No. 1). This is the second request by the parties for such an extension.

Defendants were served with Plaintiff's Complaint on December 15, 2021. On December 21, 2021, the parties submitted a stipulated Motion for a 30-day extension of time for Defendant to response to the Complaint (ECF No. 6), which the Court granted on December 22, 2021 (ECF No. 7), setting a February 4, 2022, deadline for Defendant to answer or otherwise respond to the Complaint.

The parties have been engaged in ongoing discussions regarding the terms and conditions of a settlement, which discussions have been delayed in part due to the holidays and the unavailability of certain persons employed by Defendant involved in the negotiations. An initial proposal was communicated by Defendant on December 27, 2021. Plaintiff responded to such proposal with its own counterproposal on January 5, 2022. On January 25, 2022, Plaintiff, through

counsel, communicated terms and conditions of another settlement proposal, which is currently under consideration by Plaintiff. In order to give the parties additional time to try and work out a settlement prior to moving forward with the case, the parties have agreed to give Defendant an additional 14-day extension of time to answer or otherwise respond to the Plaintiff's Complaint. For these reasons, this extension request is made for good cause and not for purposes of delay.

For the foregoing reasons, the parties hereby stipulate and agree to extend the deadline for Defendant to answer or otherwise respond to the Complaint from February 4, 2022, to February 18, 2022.

Dated: January 26, 2022

Respectfully Submitted,

GILE LAW GROUP, LTD.

/s/ Ryan Gile

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Attorney for Plaintiff BMF Wallets, LLC

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 1/27/2022

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2022, I served a full, true and correct copy of the foregoing **STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** via email on the following parties:

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